

Planning Policy,
East Devon District Council,
Blackdown House,
Border Road,
Heathpark Industrial Estate,
Honiton,
EX14 1EJ

Date: 22 March 2019

Our ref: 04051/61/NT/EB0/17216332v1

Your ref:

Dear Sir or Madam,

East Devon Community Infrastructure Levy Preliminary Draft Charging Schedule Consultation Document

On behalf of our client, Bourne Leisure Limited (“Bourne Leisure”), please find below representations on the East Devon Community Infrastructure Levy (CIL) Preliminary Draft Charging Schedule consultation document, published for comment until 22 March 2019.

By way of background, Bourne Leisure operates more than 50 holiday sites in the form of holiday parks, family entertainment resorts and hotels in Great Britain and is therefore a significant contributor to the national tourist economy, as well as local visitor economies. Within East Devon, Bourne Leisure operates Devon Cliffs Holiday Park.

We provide comments on the following aspects of the consultation document:

- 1 Holiday accommodation; and,
- 2 Hotels.

Holiday accommodation

Paragraph 2.13 of the consultation document states:

“The viability study considers a range of other non-residential uses, noting that most share similar characteristics for the purposes of viability so are covered by the same rate... The rate for holiday accommodation will depend on whether it is a standard dwelling that the purchaser intends will be used for holiday accommodation (standard residential charge), or on a holiday park which will be part of all other non-residential uses category with no CIL charge.”

Bourne Leisure endorses the Council’s clear recognition that holiday accommodation (including purpose built units) within holiday parks do not fall under the residential development category. These types of holiday accommodation are wholly distinct from residential development and are not comparable to other types of seasonal holiday lets that could also be used as dwellings. Such accommodation is narrowly restricted by condition to holiday use and can only be occupied while holiday parks and resorts are open. The units are used for short term lets of typically three, four or seven days at a time, by any family or group.

As commercial premises, this type of holiday accommodation would be subject to payments of business rates, rather than council tax. Accordingly, it would not fall under the definition of a “dwelling” contained in the Local Government Finance Act 1992, cross-referenced by the CIL Regulations (2010, as amended).

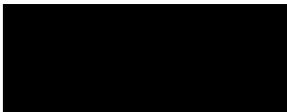
Recognition that holiday accommodation within holiday parks is not comparable to other types of seasonal holiday lets that could also be used as dwellings is welcomed. Further, based upon the viability evidence prepared, the proposed nil rate for such holiday accommodation is endorsed.

Hotels

Having reviewed the viability study prepared by Three Dragons with Ward Williams Associates to inform the emerging Charging Schedule, Bourne Leisure agrees with the proposed nil charge rate for hotel uses. The evidence clearly shows that any rate would render hotel development unviable.

We trust that the enclosed representations are clear and will assist in finalising the East Devon CIL Charging Schedule. Please do not hesitate to contact my colleague Emily Broom or me, should you require any clarification of any of the points made. We would be grateful if you would keep us informed of progress on the development of the CIL Charging Schedule and other emerging policy documents in East Devon.

Yours faithfully,



Helen Ashby-Ridgway
Associate Director

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Bourne Leisure